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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JORGE FLORES-VILLAGRAN and
DULCE NAVARRO-MARTINEZ,

Defendants.

Case No.: 2:25-cr-00097-APG-EJY

Stipulation for a Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendants FLORES-VILLAGRAN and DULCE NAVARRO-MARTINEZ, the public, or any third party not directly related to this case, any and all unredacted discovery (the "Protected Material") in this case. The parties state as follows:

1. On April 16, 2025, a grand jury returned an indictment charging JORGE FLORES-VILLAGRAN and DULCE NAVARRO-MARTINEZ with one count of Conspiracy to Distribute a Controlled Substance (Heroin, Methamphetamine & Fentanyl) in violation of Title 21, United States Code, Sections 846 and 841(a)(1), 841 (b)(1)(A)(vi), 841(b)(1)(B)(viii) and 841(b)(1)(C); one count of Deported Alien Found in the United States in

1 violation of Title 8, United States Code, Section 1326(a); and one count and of Deported Alien
2 Found in the United States in violation of Title 8, United States Code, Section (b)(1). ECF
3 No. 24.

4 2. The trial date is currently set for June 16, 2025.

5 3. The government's discovery documents the work of an undercover Homeland
6 Security Investigations (HSI) officer in addition to personal identifying information (PII) of
7 charged and uncharged co-defendants and known and unknown civilians. Portions of the
8 unredacted discovery would likely enable others to identify the undercover law enforcement
9 official and have PII of civilians related to the investigation. The government believes that
10 dissemination of the unredacted discovery ("the Protected Material") in its entirety could reveal
11 the identity of the undercover law enforcement official, which could potentially subject him to
12 retribution and frustrate undercover investigations in the future.

13 4. In order to prevent dissemination of the Protected Material, the parties intend to
14 restrict access to the Protected Material in this case to the following individuals: attorneys for
15 all parties, and any personnel that the attorneys for all parties consider necessary to assist in
16 performing the attorneys' duties in the prosecution or defense of this case, including
17 investigators, paralegals, experts, support staff, interpreters, and any other individuals
18 specifically authorized by the Court (collectively, the "Covered Individuals").

19 5. Without leave of Court, the Covered Individuals shall not:

- 20 a. make copies for, or allow copies of any kind to be made by any other person
21 of the Protected Material in this case or permit dissemination of the Protected
22 Material at the Southern Nevada Detention Center jail facility, or any other
23 detention facility where the Defendants are housed, to include leaving a copy
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1 of the Protected Material at any detention facility where the Defendants are
2 housed;

3 b. allow any other person to watch, listen, or otherwise review the Protected
4 Material;

5 c. use the Protected Material for any other purpose other than preparing to
6 defend against or prosecute the charges in the indictment or any superseding
7 indictment arising out of this case; or

8 d. attach the Protected Material to any of the pleadings, briefs, or other court
9 filings except to the extent those pleadings, briefs, or filings are filed under
10 seal.

11 6. Nothing in this stipulation is intended to restrict the parties' use or introduction
12 of the Protected Material as evidence at trial or support in motion practice. If the defendants
13 proceed to trial or any evidentiary hearing, the parties will confer to determine whether the
14 terms of this stipulation should be revisited.

15 7. The parties shall inform any person to whom disclosure may be made pursuant
16 to this order of the existence and terms of this Court's order.

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8. The defendants hereby stipulate to this protective order.

DATED this May 1, 2025.

Respectfully submitted,

For the United States:

SIGAL CHATTAH
United States Attorney

/s/ Brenna Bush
BRENNA BUSH
Assistant United States Attorney

For the Defense:

/s/ Amanda Pellizzari
AMANDA PELLIZZARI
Attorney for JORGE FLORES-VILLAGRAN

/s/ Abel Yanez
Abel Yanez
Attorney for DULCE NAVARRO-MARTINEZ

IT IS SO ORDERED:


HONORABLE ELAYNA J. YOUCHAH
United States Magistrate Judge

May 1, 2025
Date